



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

233 Peachtree Street Ste 600
Atlanta, GA 30303

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 6, 2007

Mr. Walter Ferguson
Sr. Vice President and Chief Operating Officer
c/o Mississippi River Transmission
Centerpoint Energy Gas Transmission
1111 Louisiana, Suite 1120
Houston, TX 77002

CPF 2-2007-1013W

Dear Mr. Ferguson

Between August 28, 2006 and September 1, 2006, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your Mississippi River Transmission (MRT) facilities and records in the Carlisle Team area in Arkansas

As a result of the inspection, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The item inspected and the probable violation is

1. **§192.605 Procedural manual for operations, maintenance, and emergencies.**

... (b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations. . .

... (3) Making construction records, maps, and operating history available to appropriate operating personnel.

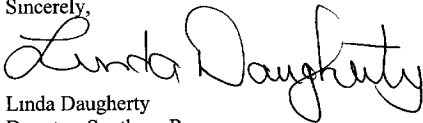
MRT did not make adequate maps and operating history available to appropriate operating personnel as required of §192 605(b)(3) The following indicates a lack of maintenance of issued Emergency Plan Books and data

- An Emergency Plan Book issued to one of the employees at Carlisle Station was not up to date, the listed MAOP of Line A-294 is 1085 psig The correct MAOP is 1,000 psig
- The Line JT-5 MAOP listed on the data sheet provided to the PHMSA inspector is 350 psig The correct MAOP is 1050 psig

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any related series of violations We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time We advise you to correct the item(s) identified in this letter Failure to do so will result in Mississippi River Transmission being subject to additional enforcement action

No reply to this letter is required If you choose to reply, in your correspondence please refer to **CPF 2-2007-1013W**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U S C 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U S C 552(b)

Sincerely,



Linda Daugherty
Director, Southern Region
Pipeline and Hazardous Materials Safety Administration

Enclosure *Response Options for Pipeline Operators in Compliance Proceedings*